

and complete information to decide the Motion, Plaintiffs hereby request leave of Court to exceed the page limit in the local rules.

II.

Plaintiffs' motion is 25 pages long excluding the caption, table of contents and table of authorities. In addition to providing their arguments for conditional certification, Plaintiffs' motion addresses the standard for conditional certification and provides a background regarding law pertaining to dancers who work for adult cabarets. Plaintiffs' Motion provides a brief regarding the Fifth Circuit authority holding that dancers are employees under the FLSA and why they are similarly situated under the FLSA. Plaintiffs' Motion also addresses the propriety of their proposed form and method of Notice, and Notice schedule. Instead of filing separate motions addressing each of these issues and duplicating the procedural history and factual background each time, Plaintiffs have combined these related issues into a single motion. Additionally, Plaintiffs have provided complete information regarding the facts, law, and the evidence (gathered at this stage) so the Court will have full information when deciding the Motion.

III.

For the foregoing reasons, Plaintiffs respectfully ask this Court to grant this Motion for Leave to Exceed Page Limits.

Respectfully submitted,

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PLAINTIFFS & CLASS MEMBERS

CERTIFICATE OF CONFERENCE

I certify that counsel has attempted to comply with the meet and confer requirements in Local Rule CV-7(h). On September 25, 2020, counsel for Plaintiffs called counsel for Defendants to confer on the relief requests herein but was unable to reach them. Plaintiffs' counsel left a voicemail regarding the same but has not yet received a response.

/s/ Don J. Foty

Don J. Foty

CERTIFICATE OF SERVICE

I certify that on this September 25, 2020, a true and correct copy of the foregoing instrument was filed through the Court's electronic case filing which will serve a copy of this document electronically on all counsel of record.

/s/ Don J. Foty

Don J. Foty